

REMARKS

Claims 1-6, 9-14, 18, 19, and 23-30 are pending in the application. Claims 12-14, 18, 19, and 23 are allowed. Reconsideration and withdrawal of the rejections are requested in view of the following remarks.

Turning to the § 102 rejections at Section 6 of the Office Action, Jones does not teach or suggest a camera support including a first purge gas port on a first housing connecting into a first interior sealed space, for delivering a purge gas into the first interior sealed space, and a second purge gas port on a second housing connecting into a second interior sealed space, for delivering a purge gas into the second interior sealed space, as recited in claims 24 and 26. Indeed, Jones does not teach purging the positioning structure disclosed therein with a gas, and there is no mention or suggestion in Jones of purging interior sealed spaces of the positioning structure.

As explained at paragraph 0063 of the application, by purging the interior spaces of the camera support with gas, the need for painting, plating, or otherwise finishing the internal surfaces of the camera support is avoided, and internal corrosion is reduced or eliminated. Since the purged spaces are positively pressurized, they can also remain dry even if a slow leak develops. Jones does not suggest or recognize the advantages of such a purging process.

On the contrary, Jones teaches a process for valve-directed filling and draining of paired chambers, which generates hydraulic force for applying torque to the shaft of a positioner (col. 6, lines 26-29). During this process, hydraulic fluid is drained from the chambers during rotation of the shaft (col. 6, lines 30-32). Draining hydraulic fluid does not, however, constitute purging the system with a gas.

Section 4 of the Office Action asserts that draining fluid does in fact constitute purging a system with a gas because a fluid can be a liquid or a gas. While it is true that a fluid can be a liquid or a gas, hydraulic fluid is by definition a liquid (hydraulic - *operated by, moved by, or employing water or other liquids in motion* – Dictionary.com). Thus, the hydraulic fluid drained in Jones is a liquid, not a gas. Furthermore, draining is a process necessarily involving a liquid, not a gas (drain – 1. *to withdraw or draw off (a liquid) gradually; remove slowly or by degrees, as by filtration.* 2. *to withdraw liquid gradually from; make empty or dry by drawing off liquid* – Dictionary.com). Additionally, the hydraulic fluid in Jones does not act to purge the chambers but rather is a liquid that may be removed from the chambers via a draining process to control torque applied to a positioner shaft. Thus, the hydraulic fluid described in Jones is not a purge gas, and the draining process described therein is unrelated to a purge gas process.

Jones mentions that its hydraulically driven system could be converted to a pneumatically driven system (col. 6, lines 11-19). The specific details and configuration of such a pneumatically driven system are not provided. Regardless, even if a pneumatic fluid or gas is delivered into a chamber to actuate the positioner, there is clearly no suggestion or motivation in Jones to use the gas for purging the interior of the chamber. A purging process involves replacing a potentially corrosive atmosphere (air containing water vapor) with an inert gas, such as nitrogen. There is no motivation in Jones to perform such a purging process, or to deliver a purge gas into a sealed interior space at any time. Rather, Jones simply teaches filling and draining chambers with fluid for applying torque to a positioner shaft. Thus, there is no suggestion in Jones to include purge gas ports, as claimed, in its positioning system. Claims 24 and 26, therefore, are believed to be allowable.

Turning to the § 103 rejections at Section 8 of the Office Action, Nakatani does not disclose a pan lock pin, as claimed. The claimed pan lock pin is moveable between a lock position for preventing movement between the pan housing and the pan arm, and an unlock position in which the pan lock pin is withdrawn from the pan housing or pan arm to allow rotational movement between the pan housing and the pan arm (see paragraph 0042 of application). Thus, the pan lock pin provides a quick and easy method for locking the pan housing in place relative to the pan arm, and for unlocking the pan housing from the pan arm to provide relative movement between them.

Nakatani, conversely, discloses a screw 32 that may be advanced or withdrawn within a screw hole 26, by a screwdriver or other tool, when a lid 34 is removed to expose the screw hole 26. Advancing or withdrawing the screw 32 increases or decreases the axially compressive force between a pan body 15 and a base 11, resulting in increased or decreased resistance to panning movement such that an optimum panning force may be set. Accordingly, readjustment of the panning force may be performed even after assembly of the panhead, which purportedly results in improved quality control and efficiency of production and manufacture (see col. 5, line 46-col. 6, line 27).

Thus, Nakatani teaches a system that allows for the methodical adjustment of the panning force between a pan body and a base by advancing or withdrawing a screw. In other words, Nakatani discloses a system that facilitates adjusting the degree of resistance to panning movement between the base and the pan body to meet a user's preferences. The claimed pan lock pin, conversely, is used to completely

prevent or freely allow relative movement between a pan housing and a pan arm. The pan lock pin is not used to gradually increase or decrease the relative resistance to panning between the pan housing and the pan arm.

Indeed, a screw or other threaded element is required to effectively increase or decrease resistance to panning movement in the Nakatani system. A pin, as claimed, could not effectively be used to accomplish these objectives. Moreover, the process for manipulating the screw in Nakatani is much more cumbersome than is the process for manipulating the claimed pan lock pin. Thus, Nakatani is unrelated to, and does not teach or suggest using, a pan lock pin, as claimed. Claim 1, therefore, is believed to be allowable.

The remaining rejections are directed to claims that depend from claims shown above to be allowable. Several of the dependent claims include features similar to or cumulative with those shown above to be allowable. Thus, many of the dependent claims not specifically addressed herein are believed to be separately allowable over the cited references.

In view of the foregoing, it is submitted that the claims are in condition for allowance. A Notice of Allowance is requested.

Dated: Dec. 1, 2006

Respectfully submitted,

Customer No. 34055
Perkins Coie LLP
Patent - LA
P.O. Box 1208
Seattle, WA 98111-1208
Phone: (310) 788-9900
Fax: (206) 332-7198

PERKINS COIE LLP

By: Kenneth H. Ohriner
Kenneth H. Ohriner
Reg. No. 31,646